

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN. S. DISTRICT COURT
EASTERN DISTRICT - WI
FILED

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

THE HEARTLAND GROUP VENTURES, LLC;
HEARTLAND PRODUCTION AND RECOVERY
LLC; HEARTLAND PRODUCTION AND
RECOVERY FUND LLC; HEARTLAND
PRODUCTION AND RECOVERY FUND II LLC;
THE HEARTLAND GROUP FUND III, LLC;
HEARTLAND DRILLING FUND I, LP; CARSON
OIL FIELD DEVELOPMENT FUND II, LP;
ALTERNATIVE OFFICE SOLUTIONS, LLC;
ARCOOIL CORP.; BARRON PETROLEUM
LLC; JAMES IKEY; JOHN MURATORE;
THOMAS BRAD PEARSEY; MANJIT SINGH
(AKA ROGER) SAHOTA; and RUSTIN
BRUNSON,

Defendants,

and

DODSON PRAIRIE OIL & GAS LLC; PANTHER
CITY ENERGY LLC; MURATORE FINANCIAL
SERVICES, INC.; BRIDY IKEY; ENCYPER
BASTION, LLC; IGROUP ENTERPRISES LLC;
HARPRIT SAHOTA; MONROSE SAHOTA;
SUNNY SAHOTA; BARRON ENERGY
CORPORATION; DALLAS RESOURCES INC.;
LEADING EDGE ENERGY, LLC; SAHOTA
CAPITAL LLC; and 1178137 B.C. LTD.,

Relief Defendants.

Misc. No. 22-MC-002

Related to
Civ. No. 4-21CV-1310-O
United States District
Court for the Northern
District of Texas,
Fort Worth Division

NOTICE OF ORDER APPOINTING RECEIVER PURSUANT TO 28 U.S.C. § 754

NOTICE IS HEREBY GIVEN that Deborah D. Williamson, as the Court-appointed Receiver (the “Receiver”) in the above-captioned action pending before the United States District Court for the Northern District of Texas, Fort Worth Division (the “Receivership Court”), hereby files with the United States District Court for the Eastern District of Wisconsin (the “District”) a copy of the Complaint, attached hereto as **Exhibit A**, and the *Order Appointing Receiver* [TXND Case No. 4-21CV-1310-O, ECF No. 17] (the “Receivership Order”),¹ attached hereto as **Exhibit B**, previously filed in and entered by the Receivership Court.

The attached Receivership Order, among other things, appoints Deborah D. Williamson as Receiver of all assets of The Heartland Group Ventures, LLC; Heartland Production and Recovery LLC; Heartland Production and Recovery Fund LLC; Heartland Production and Recovery Fund II LLC; The Heartland Group Fund III, LLC; Heartland Drilling Fund I, LP; Carson Oil Field Development Fund II, LP; Alternative Office Solutions, LLC; Arcooil Corp.; Barron Petroleum LLC; Dodson Prairie Oil & Gas LLC; Panther City Energy LLC; Encypher Bastion, LLC; Barron Energy Corporation; Dallas Resources Inc.; Leading Edge Energy, LLC; Sahota Capital LLC; and 1178137 B.C. LTD., and was duly entered and filed by the Receivership Court. The Receiver believes that Receivership Assets may exist in the District. Accordingly, the attached Complaint and Receivership Order are being filed by the Receiver in the District pursuant to 28 U.S.C. § 754, which provides in part:

[T]he receiver shall, within ten days after the entry of [her] order of appointment, file copies of the complaint and such order of appointment in the district court for each district in which property is located[.]

¹ Capitalized terms used herein but not otherwise defined shall have the meaning ascribed in the Receivership Order.

28 U.S.C. § 754.

The attached Complaint and Receivership Order are being filed by the Receiver for notice purposes only.

Dated: January 3, 2022

Respectfully submitted,

By: /s/ Deborah D. Williamson

Deborah D. Williamson

(Receiver)

State Bar No. 21617500

dwilliamson@dykema.com

DYKEMA GOSSETT PLLC

112 East Pecan Street, Suite 1800

San Antonio, Texas 78205

Telephone: (210) 554-5500

Facsimile: (210) 226-8395

Jeffrey R. Fine

(Lead Counsel)

State Bar No. 07008410

jfine@dykema.com

Alison R. Ashmore

State Bar No. 24059400

aashmore@dykema.com

DYKEMA GOSSETT PLLC

1717 Main Street, Suite 4200

Dallas, Texas 75201

Telephone: (214) 462-6400

Facsimile: (214) 462-6401

and

Danielle N. Rushing

State Bar No. 24086961

drushing@dykema.com

DYKEMA GOSSETT PLLC

112 East Pecan Street, Suite 1800

San Antonio, Texas 78205

Telephone: (210) 554-5500

Facsimile: (210) 226-8395

and

Rose L. Romero
State Bar No. 17224700
Rose.Romero@RomeroKozub.com
LAW OFFICES OF ROMERO | KOZUB
235 N.E. Loop 820, Suite 310
Hurst, Texas 76053
Telephone: (682) 267-1351

COUNSEL TO RECEIVER